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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
	)	CC Dkt. No. 95-116
Telephone Number Portability	)	RM 8535

REPLY COMMENTS OF AT&T CORP.

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September 16, 1996

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SUMMARY

The comments reflect broad agreement on several fundamental issues regarding cost recovery for permanent number portability. Overwhelmingly, commenters agree that the costs of permanent number portability should be divided into three categories -- industry costs of deploying and operating the regional (or state) Service Management System ("SMS"); carrier-specific costs directly related to implementing number portability; and carrier-specific costs not directly related to implementing number portability. Commenters also agree that the Commission should develop specific, number portability cost recovery rules for the first two categories of costs, but should require carriers to recover the third category of costs -- if at all -- through other mechanisms.

While the parties agree generally on the number and type of cost categories, there is some disagreement on the proper characterization of pertinent costs, as well as the proper methods of recovery. Incumbent local exchange carriers differ from prospective competitors on two primary issues: (i) the types of network upgrades that may properly be characterized as carrier-specific costs directly related to number portability, and (ii) the mechanisms that will be used to allocate and recover industry SMS costs and carrier-specific costs directly related to number portability. As AT&T has previously shown, the Commission should use the categories of portability costs it established in connection

with 800 number portability, and should adopt cost recovery mechanisms that drive carriers to maximize efficiency in the use of industry facilities and the design and operation of their own networks. The Commission should also ensure that carriers are free to recover the costs of number portability in the manner they choose, and that incumbent local exchange carriers are not granted exogenous cost treatment that would allow them to pass number portability costs on to potential competitors.

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REPLY COMMENTS OF AT&T CORP.

Pursuant to the Commission's First Report and Order (the "First Report") and Further Notice of Proposed Rulemaking (the "Further Notice"), AT&T Corp. ("AT&T") hereby replies to the comments of other parties on recovery of the costs of implementing and providing permanent number portability, as required by the Commission's rules and the Telecommunications Act of 1996 (the "1996 Act").[1]

The comments reflect broad agreement on several fundamental issues regarding cost recovery for permanent number portability. Overwhelmingly, commenters agree that the costs of permanent number portability should be divided into three categories -- industry costs of deploying and operating the regional (or state) Service Management System ("SMS"); carrier-specific costs directly related to

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[1] In the Matter of Telephone Number Portability, CC Docket No. 95-116, First Report and Order and Further Notice of Proposed Rulemaking, released July 2, 1996, FCC 96-286. The parties that have submitted comments, and the abbreviations used to identify these parties, are set forth in Appendix A hereto.

implementing number portability; and carrier-specific costs not directly related to implementing number portability.[2] Commenters also agree that the Commission should develop specific, number portability cost recovery rules for the first two categories of costs, but should require carriers to recover the third category of costs -- if at all -- through other mechanisms.[3] Parties further agree that the two cost recovery principles identified in the Further Notice,[4] while useful, are insufficient by themselves to guide the Commission in establishing the proper mechanisms for recovery of costs of number portability.[5] Finally, commenters agree that industry SMSs developed under the auspices of state commissions should be governed by the cost recovery principles established by the Commission in this proceeding.[6]

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2 See, e.g., Bell Atlantic, p. 2; GTE, p. 4; PacTel, p. 4; MCI, p. 2; MFS, pp. 2-3; Sprint, p. 2; TRA, pp. 3-4.

3 See, e.g., MCI, pp. 4-11; TCG, p. 9.

4 In the Further Notice (para. 210), the Commission stated that "(i) a competitively neutral cost recovery mechanism should not give one service provider an appreciable, incremental cost advantage over another service provider, when competing for a specific subscriber; and (2) a competitively neutral cost recovery mechanism should not have a disparate effect on the ability of competing service providers to earn a normal return." (citations omitted).

5 See, e.g., SBC, p. 9, n.4.

6 See, e.g., ALTS, p. 3; MFS, p. 8; TW Comm, p. 6. There is also agreement that a combined industry Service Management System/Service Control Point ("SMS/SCP") is

(footnote continued on following page)

While the parties agree generally on the number and type of cost categories, there is some disagreement on the proper characterization of pertinent costs, as well as the proper methods of recovery. The dissonant commenters -- almost all incumbent local exchange carriers -- differ from prospective exchange, exchange access, and toll competitors on two primary issues: (i) the types of network upgrades that may properly be characterized as carrier-specific costs directly related to number portability, and (ii) the mechanisms that will be used to allocate and recover industry SMS costs and carrier-specific costs directly related to number portability.[7] As explained in AT&T's comments,[8] the Commission should use the categories of portability costs it established in connection with 800 number portability, and should adopt cost recovery mechanisms that drive carriers to maximize efficiency in the use of industry facilities and the design and operation of their own networks. No commenter has demonstrated any basis to depart from these principles. The Commission should also ensure that carriers are free to recover the costs of number

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(footnote continued from previous page)

not an efficient or appropriate portability architecture. See, e.g., NYNEX, p. 3, n.2; TW Comm, p. 10.

7 See, e.g., BellSouth, pp. 5-7; PacTel, pp. 8-9; NYNEX, pp. 4-10; SBC, pp. 9-11.

8 AT&T, pp. 4-17.

portability in the manner they choose, and that incumbent local exchange carriers are not granted exogenous cost treatment that would allow them to pass number portability costs on to potential competitors.

I. The Commission Should Adhere to Established and Applicable Precedents for Definition of Industry Costs of, Carrier-Specific Costs Directly Related to, And Carrier-Specific Costs Not Directly Related to Permanent Number Portability

The three cost categories proposed by the Commission (Further Notice, para. 208) parallel cost categories established during implementation of 800 number portability. This is appropriate, because the types of costs incurred for permanent number portability will mirror those incurred for 800 number portability.[9] The industry

[9] In the 800 context, the Commission identified industry SMS costs, carrier costs directly related to implementing 800 number portability, and other carrier costs not directly related to implementing 800 number portability. See In the Matter of Provision of Access for 800 Service, Second Report and Order, ("Second Report and Order"), 8 FCC Rcd. 907 (1993). The Commission has previously treated as directly related to portability only those "costs incurred specifically for the implementation and operation of the [portability] system." Second Report and Order, 8 FCC Rcd. at 907, n.3. The Commission treated as not directly related "the remaining costs [which] represent a general network upgrade [,] because SS-7 is a new network infrastructure that will increase the efficiency with which LECs provide existing services." Id. (citations omitted). The Commission has categorized permanent number portability costs consistent with its prior orders, by stating that the cost of number portability-specific software deployed in an end office switch would be directly related to number portability, but the cost of SS-7 signalling facilities deployed to allow the switch to perform number portability and other functions would not. Further Notice, paras. 221, 227.

will establish industry SMS(s) to support number portability, while carriers will perform network upgrades to provide number portability capability to customers. As with 800 number portability, SMS costs should be attributed to the industry and recovered from industry participants based on use of the industry SMS, and the costs of carrier-specific costs directly related to number portability should be assigned to carriers, who will recover these costs consistent with principles established by the Commission.[10]

A few incumbent local exchange carriers, however, urge the Commission to depart from prior decisions defining, categorizing, and separating number portability costs. Although these carriers purport to adhere to established definitions of cost categories, they in effect seek reconsideration of prior Commission determinations that certain carrier-specific costs are not directly related to portability.[11] In particular, these commenters suggest that carrier-specific costs (such as core SS-7 or AIN network upgrades) that are incurred by carriers sooner than those

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[10] See Second Report and Order, 8 FCC Rcd at 907. As commenters agree, other carrier costs -- costs not incurred for the specific purpose of implementing number portability -- should not be attributed to number portability and should not be included in number portability cost recovery mechanisms.

[11] See, e.g., GTE, p. 6; NYNEX, p. 4; PacTel, p. 9.

carriers planned,[12] or that are incurred in exchanges and end offices not previously slated for upgrade, are "directly related" to number portability.[13]

This re-definition of "directly related" costs is completely unwarranted, as the Further Notice recognizes.[14] Core SS-7 and AIN network upgrades, whenever and wherever they are undertaken, will increase the efficiency with which carriers provide existing services,[15] and enable carriers to offer new services and capabilities to existing customers in an increasingly competitive market.[16] Thus, these costs are more properly characterized as general network upgrades, and are not directly attributable to the implementation of number portability.[17] The Commission so treated these costs in the context of 800 number portability -- without regard to local exchange carrier claims that unplanned and accelerated expenses would be incurred -- and there is no

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12 A number of incumbent local exchange carriers refer to these costs as "advancement" costs. See, e.g., NYNEX, p. 4; PacTel, p. 9.

13 See, e.g., GTE, pp 5-6. The suggestion that carrier-specific costs for implementation of number portability that are not supported by a "business case," USTA, p. 2, be treated as a cost directly related to number portability is simply a variation on this proposal.

14 See Further Notice, paras. 208-209, 227.

15 See Second Report and Order, 8 FCC Rcd. at 907.

16 See id.

17 See id.

reason to treat such costs differently for purposes of implementing permanent number portability.[18]

The Commission should likewise reject the suggestion that it simply deem some undefined percentage of carrier costs as directly related to number portability, rather than attempt to distinguish between those carrier costs that are directly related, and those carrier costs that are not directly related, to number portability.[19] Adoption of this proposal would create significant incentives for carriers to undertake unrelated network upgrades at the time permanent number portability is implemented, in order to subsidize and reduce the cost of providing other capabilities and services. This is

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[18] See Second Report and Order, 8 FCC Rcd. at 911 (costs of accelerating SS-7 deployment not treated as directly related to 800 number portability). While the Commission should define carrier-specific costs directly related to number portability in the same way that it did for purposes of 800 number portability, see infra, n.8, the Commission should ensure that such costs are recovered consistent with Section 251(e)(2) and the pro-competitive intent of the 1996 Act. Specifically, the Commission should not grant exogenous treatment to price-cap local exchange carriers for directly related number portability costs, because such treatment would permit incumbent LECs to shift their share of number portability costs to other carriers through charges for bottleneck access services. Such a transfer of costs would raise the costs of potential local exchange and intraLATA toll competitors, and would prevent competitively neutral cost recovery. In the context of permanent number portability, carriers' direct costs should be identified so that they may be recovered -- to the extent permitted by market forces -- through retail rates to subscribers.

[19] See CBT, p. 5.

precisely the kind of cross-subsidy that proper identification and separation of number portability costs should prevent. Moreover, the Commission has previously distinguished between carrier-specific costs directly related to, and carrier costs not directly related to, 800 number portability, and can easily do so in the case of permanent number portability.[20]

II. The Commission Should Adopt Cost Recovery Rules That Ensure Competitive Neutrality And Maximize Incentives for Carriers Efficiently to Reduce Costs

Just as the comments confirm that the Commission must properly define categories of number portability costs, the comments confirm equally that the Commission will achieve the benefits of proper cost characterization only by ensuring that costs within each category are recovered in an efficient and competitively neutral manner. In particular, the Commission should adopt cost recovery rules that ensure maximum efficiency in use of the industry SMS and in upgrades of, and modifications to, individual carrier networks.[21]

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[20] See Second Report and Order, 8 FCC Rcd. at 907; In the Matter of Provision of Access for 800 Services; see First Report and Order, ("Report and Order") 6 FCC Rcd. 5421, 5426-27 (1991).

[21] See AT&T, pp. 6-16.

A. Costs of the Industry SMS Should Be <u>Recovered Through Charges for Rate Elements</u>

There is only limited support for the Commission's tentative conclusion (<u>Further Notice</u>, paras. 217-219) that the first two subcategories of permanent number portability costs should be recovered through an assessment based on each carrier's gross telecommunications revenues, less charges paid to other carriers.[22] A number of incumbent local exchange carriers slightly alter the Commission's proposal by asserting that the implementation and administrative expenses of industry SMSs should be recovered through an assessment on all carriers based on gross <u>retail</u> revenues.[23]

As AT&T has demonstrated, however, it is inappropriate to use <u>any</u> revenues-based assessment to recover of common industry SMS costs. A revenues-based assessment would reduce incentives for carriers to maximize the efficiency of their SMS use, either through aggregation of demand for SMS functionalities[24] or more cost-effective connections to the SMS,[25] because charges would be based on

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22 <u>See</u>, <u>e.g.</u>, NexTel, pp. 2-3; MFS, p. 7; TCG, pp. 4-6.

23 <u>See</u>, <u>e.g.</u>, Ameritech, p. 6; Bell Atlantic, p. 5; NYNEX, p. 8.

24 <u>See</u> AT&T, p. 10.

25 <u>See</u> <u>id.</u>

revenues and not on usage. No party has provided any justification for the Commission to depart from the use of an established and proven rate element structure which will fairly and more efficiently distribute shared costs.

The proposal by some incumbent local exchange carriers to adopt a retail revenues-based assessment is even more inappropriate. An assessment based only on retail revenues would unjustifiably exclude a substantial portion, perhaps a majority, of revenues received by incumbent local exchange carriers -- revenues from bottleneck services and functions purchased by other carriers (e.g., access, wholesale local exchange service, and unbundled network elements). At the same time, competitive local exchange carriers and toll carriers that rely on these bottleneck services and elements would be "assessed" based on revenues that are in fact just passed through to incumbent local exchange carriers. The retail revenues-based assessment proposed by the incumbents would thus permit incumbent local exchange carriers improperly to shift a portion of their number portability costs to other, potentially competing carriers -- an outcome that even some incumbent local exchange carriers recognize will undermine local exchange competition.[26]

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[26] See, e.g., SBC, p. 16 ("It is unreasonable and inappropriate for a carrier to raise the rates of services it provides to other carriers to recover its own number portability costs"); U S West, pp. 18-19.

B. The Commission Should Require Each Carrier To Bear The Costs of Its Own Network Upgrades

There is general support for requiring each carrier to bear its own network costs directly related to implementing permanent number portability.[27] Competitive exchange carriers,[28] interexchange carriers,[29] wireless carriers,[30] a number of state commissions,[31] and a number of incumbent LECs[32] confirm that this allocation method will provide strong incentives to minimize costs and implement necessary network upgrades with maximum efficiency. Commenters confirm further that any arrangement under which carrier costs are "pooled" for allocation based on revenues (or some other measure) will blunt incentives for individual carriers to reduce their upgrade costs and encourage carriers to attribute to number portability costs of general network upgrades and unrelated capabilities and services.

Indeed, only a few commenters -- predominantly incumbent LECs -- suggest that carrier costs directly

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27 See, e.g., ALTS, p. 6; Frontier, p. 2; MCI, pp. 9-10; Missouri PUC, pp. 4-5; U S West, pp.18-19; Sprint, p. 8; TCG, pp. 7-8; TRA, p. 11.

28 See, e.g., MFS, p. 3; TCG, p. 8.

29 See, e.g., MCI, pp. 9-10.

30 See, e.g., Omnipoint, p. 4.

31 See, e.g., Ohio PUC, p. 10; Missouri PSC, pp. 4-5.

32 See e.g., Frontier, pp. 2-3; PacTel, pp. 10-11.

related to number portability should be "pooled," and then allocated among carriers according to retail telecommunications revenues,[33] or some other measure.[34] These commenters in no way refute the obvious conclusion that such "pooling" will create incentives for individual carriers to inflate network upgrade costs, and unnecessarily raise costs of entry into the local exchange and intraLATA toll markets.[35] As with the industry SMS, the Commission can promote efficiency and encourage innovation by declining to pool individual carrier costs. The comments overwhelmingly confirm that it should do so.

III. The Commission Should Not Require Imposition Of An End User Surcharge and Should Not Grant Exogenous Cost Treatment for Price Cap Local Exchange Carriers

Competitive local exchange carriers[36] interexchange carriers,[37] wireless service providers,[38] and

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33 See, e.g., Bell Atlantic, pp. 4-5; BellSouth, p. 8.

34 See, e.g., SBC, pp. 7-9 (number of presubscribed local exchange, intraLATA toll, interexchange and wireless equal access lines or "EALs").

35 SBC's EAL proposal is similarly flawed. Basing a carrier's cost of network upgrade on its percentage of presubscribed "lines," rather than its choices in design and deployment of facilities, will not provide incentives to reduce costs.

36 See, e.g., TCG, p. 10; TW Comm, p. 14.

37 See, e.g., AT&T, p. 15; MCI, p. 10.

38 See, e.g., PCIA, p. 8; Nextel, p. 4.

state commissions[39] agree that the Commission should not mandate an end user surcharge to recover number portability costs. States and carriers alike recognize that industry participants should more properly recover number portability costs in the manner and to the extent that market conditions permit.

Moreover, there is no need for the Commission to grant exogenous cost treatment, under the Commission's price cap rules, for the carrier-specific direct costs or other costs of implementing number portability. As explained above, exogenous cost treatment will permit incumbent local exchange carriers to increase the costs of carriers seeking to compete with those incumbents.[40]

[39] See, e.g., California PUC, p. 14; NY PSC, p. 2.

[40] See supra, n.18.

CONCLUSION

For the reasons stated above, the Commission should adopt cost recovery rules for number portability that ensure competitive neutrality and maximize incentives for carrier efficiency, as described in AT&T's comments.

Respectfully submitted,

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September 16, 1996

APPENDIX A

Parties Filing Comments

Name	Abbreviation
Ad Hoc Coalition of Competitive Carriers	Ad Hoc Coalition
AirTouch Paging, Arch Communications Group, Inc.	Air Touch Paging
America's Carriers Telecommunications Association	ACTA
Ameritech Operating Companies	Ameritech
Association for Local Telecommunications Services	ALTS
Association of Public Safety Communications Officials	APSCO
AT&T	AT&T
Bell Atlantic	Bell Atlantic
Bell Atlantic NYNEX Mobile, Inc.	Bell Atlantic/NYNEX
BellSouth Corporation	BellSouth
California Cable Television Association	CCTA
California (People and State of), California Public Utility Commission	CA PUC CPUC
Cellular Telecommunications Industry Association	CTIA
Cincinnati Bell Telephone	CBT
Competitive Telecommunications Association	CompTel
Ericsson Corporation	Ericsson
Florida Public Service Commission	Florida PSC
General Communications, Inc.	GCI
General Services Administration	GSA
GO Communications Corporation	GO
GTE Service Corporation	GTE
GVNW Inc. Management	GVNW
Independent Telecommunications Networks, Inc.	ITN
Interactive Services Association	ISA
Jones Intercable, Inc.	Jones Intercable
David L. Kahn	Kahn
LDDS Worldcom	LDDS
MCI Telecommunications Corporation	MCI
Microwave Telecommunications Corp.	MTC
MFS Communications Company, Inc.	MFS
National Association of Regulatory Utility Commissioners	NARUC
National Emergency Number Association	NENA
National Exchange Carrier Association	NECA
National Telephone Cooperative Association	NTCA
National Wireless Resellers Association	NWRA
New York State Department of Public Service	NYDPS
Nextel Communications Incorporated	Nextel
NYNEX Telephone Companies	NYNEX
Ohio Public Utilities Commission	Ohio PUC
Omnipoint Corporation	Omnipoint
Organization for the Protection and Advancement of Small Telephone Companies	OPASTCO
Pacific Bell and Nevada Bell	PacBell
Paging Network	Paging Network
Personal Communications Industry Association	PCIA
PCS PrimeCo, L.P.	PCS PrimeCo
Southwestern Bell Communications	SBC
Scherers Communications Group, Inc.	Scherers
Sprint Corporation	Sprint
TDS Telecom	TDS

Telecommunications Resellers Association	TRA
Telemation International, Inc.	Telemation
Teleport Communications Group, Inc.	TCG
Teleservices Industry Association	TIA
Texas Advisory Commission on State Emergency Communications	TX ACSEC
Texas Public Utility Commission	Texas PUC
Time Warner Communications Holding Inc.	TWCOMM
US Airwaves Inc.	US Airwaves
US Intelco Networks Inc	US Intelco
US Small Business Administration	SBA
US West Communications Inc	U S West
United States Telephone Association	USTA
Yellow Pages Publishers Association	YPPA

CERTIFICATE OF SERVICE

I, Karen Gillis, do hereby certify that on this 16th day of September, 1996, a copy of the foregoing "Reply Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached:

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